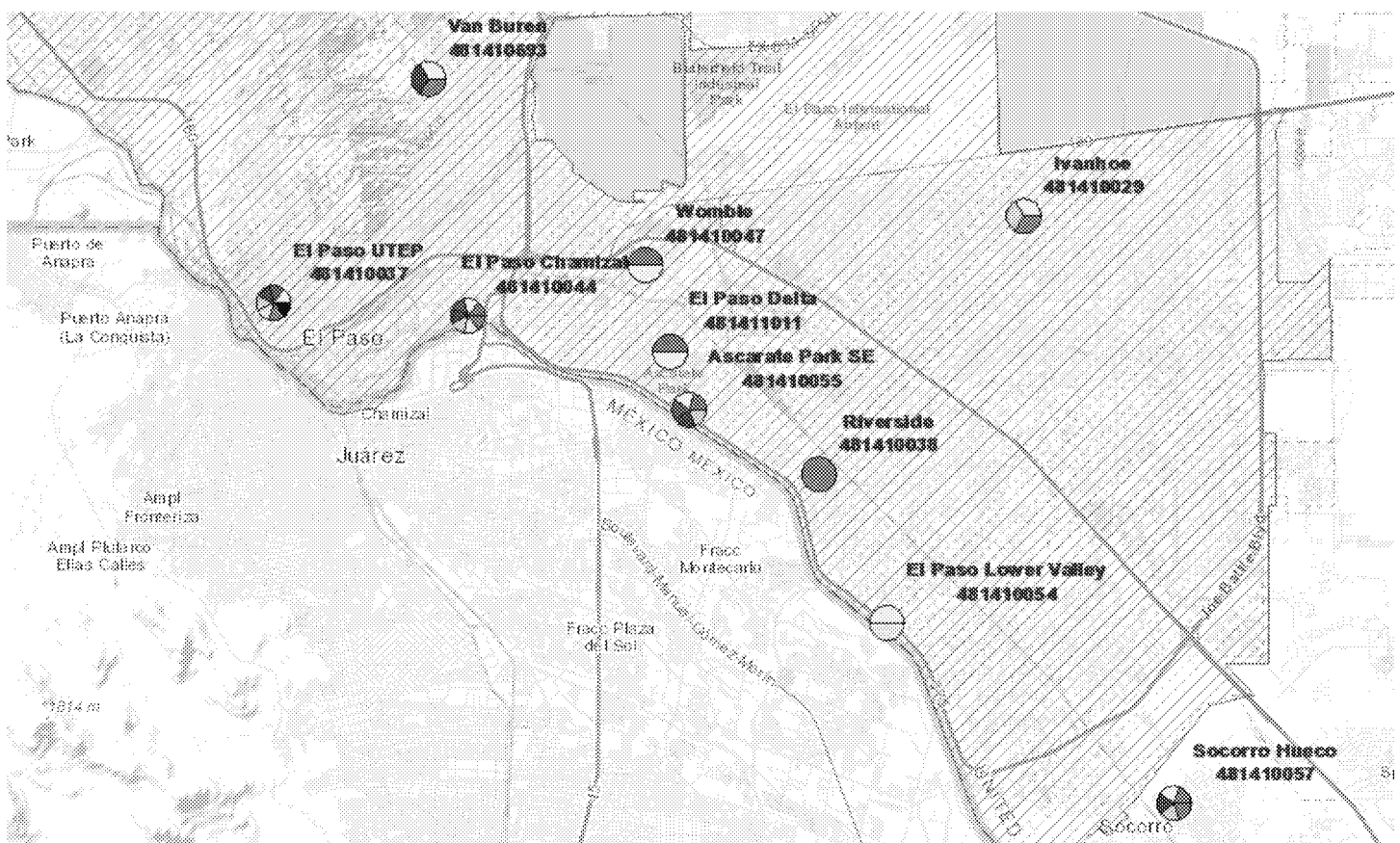


Message

From: Lecelle Clarke [Lecelle.Clarke@Tceq.Texas.Gov]
Sent: 6/15/2018 4:32:32 PM
To: Crawford, Dorothy [Crawford.Dorothy@epa.gov]
CC: Verhalen, Frances [verhalen.frances@epa.gov]; Weslee Copeland [weslee.copeland@tceq.texas.gov]; Melanie Hotchkiss [melanie.hotchkiss@tceq.texas.gov]; Sally Klein [sally.klein@tceq.texas.gov]; Holly.Landuyt_tceq.texas.gov [Holly.Landuyt@tceq.texas.gov]; Julie Eldredge [Julie.Eldredge@Tceq.Texas.Gov]
Subject: RE: PM10 Exceedances - 2017 and 2018 - Socorro Hueco site 48-141-0057 - Pre-Initial Notification discussions

Good Afternoon Dot,

Per your request, I have verified that the Socorro Hueco PM10 sampler is outside the El Paso PM10 nonattainment area. Please see the map below showing that the Socorro monitor is located just outside the nonattainment area (shaded).



(Map Source: TCEQ's

GeoTAM <https://tceq.maps.arcgis.com/apps/webappviewer/index.html?id=ab6f85198bda483a997a6956a8486539>)

Best regards,

Lecelle Clarke
Monitoring Division | Ambient Monitoring Section
Texas Commission on Environmental Quality
512.239.0664 | Lecelle.Clarke@Tceq.Texas.Gov

From: Crawford, Dorothy [mailto:Crawford.Dorothy@epa.gov]
Sent: Tuesday, June 12, 2018 3:25 PM
To: Hodgkiss, Miranda <Hodgkiss.Miranda@epa.gov>; Weslee Copeland <weslee.copeland@tceq.texas.gov>; Lecelle Clarke <Lecelle.Clarke@Tceq.Texas.Gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>
Subject: PM10 Exceedances - 2017 and 2018 - Socorro Hueco site 48-141-0057 - Pre-Initial Notification discussions

Thank you for taking the call today. Glad we talked.

My understanding of the conversation is:

Currently there are 2 potential Exceptional Events that occurred at the subject monitor – 4/25/17, 5/2/18; TCEQ may add High Wind Dust Event (HWDE) indicator flags to the PM10 data for these two 24 Hour periods; Since there may be more exceedances in 2018, at this time, TCEQ plans to submit a formal Initial Notification in the spring 2019; and
The spring 2019 Initial Notification may reflect the 2 known exceedances and any other exceedances that may occur in 2018.

Other notes:

- Suggest the future formal Initial Notification letter include a projected or suggest submittal data for Exceptional Event Demonstration. While TCEQ knows the technical details of the exceedance cause and the TCEQ internal workload/resource situation, R6 will indicate in the response to the Initial Notification, the due date for the Demonstration.
- I will be sending TCEQ some post-2016 Exceptional Event Rule (2016 EE Rule) HWDE Demonstration packages prepared by others.
- We ask that TCEQ keep us posted of any additional exceedances that occur.
- TCEQ and R6 have a mutual understanding that any exceedance measured at the PM10 Socorro Hueco monitor likely has regulatory significance due to 6-day sampling frequency and how the PM10 Design Value is calculated.
- I ask that TCEQ verify my understanding that the Socorro Hueco monitor is located outside the existing PM10 Non-Attainment El Paso area.
- Suggest we have another discussion prior to TCEQ's formal Initial Notification submittal.
- Generally, Demonstrations for PM are less technically nuanced than Ozone, however, evidence of anthropogenic control implementation tends to continue to be a challenge for PM Demonstrations.
- Schedules/timelines
 - AQS indicator flagging by TCEQ does not trigger any Exceptional Event schedules but could be useful when responding to any input from the pending posting on the EPA national website of a monitor DV above PM10 NAAQS.
 - The 2016 EE Rule set a goal for the EPA Region 6 Regional Administrator to respond to an Initial Notification and complete Demonstration within 60 day and 12 months, respectively. Other considerations will likely necessitate shortening these time frames (e.g., 4/12/18 Presidential Memorandum for the Administrator of the Environmental Protection Agency).

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771